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**Attorney for Defendant**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON**

**UNITED STATES OF AMERICA,**

**No. 3:19-cr-00596-SI-2**

**Plaintiff,**

**v.**

**DEFENDANT'S UNOPPOSED  
MOTION TO CONTINUE  
TRIAL DATE**

**JOSEPH LUCIO JIMENEZ,**

**Defendant.**

Joseph Lucio Jimenez, Defendant in the above-entitled case, through counsel, Francesca Freccero, moves to continue the jury trial in this case currently set for February 25, 2020, for approximately 30 days, to a date on or after March 24, 2020, that is convenient for this Court and counsel. The government, through AUSA Craig Gabriel in regard to both criminal cases, does not object. As further described in the Declaration of Counsel,

Mr. Jimenez is aware of his right to a speedy trial and he waives that right to the extent necessary to accommodate the instant motion.

Mr. Jimenez understands that this motion will result in excludable delay under the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

Respectfully submitted on February 5, 2020.

/s/ *Francesca Freccero*  
Francesca Freccero  
Assistant Federal Public Defender